

# DOCKET SECTION

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

Postal Rate and Fee Changes, 1997

Docket No. R97-1

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

**NEWSPAPER ASSOCIATION OF AMERICA  
INTERROGATORIES TO  
ALLIANCE OF INDEPENDENT STORE OWNERS AND PROFESSIONALS  
WITNESS GODFRED OTUTEYE (NAA/AISOP-T1-1-8)  
January 22, 1998**

The Newspaper Association of America hereby submits the attached interrogatories to Alliance of Independent Store Owners and Professionals witness Godfred Otuteye (AISOP-T-1) and respectfully requests a timely and full response under oath.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

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## CERTIFICATE OF SERVICE

I hereby certify that I have this date served the instant document on all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

January 22, 1998

William B. Baker  
William B. Baker

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NAA/AISOP-T1-1. For the most recent fiscal year, please provide the following data on the Standard A mailings of your company. (If precise data are not available, estimates can be provided.)

- a. What was the total volume of Standard A mail for the most recent fiscal year?
- b. What percentage of your volumes were shared mail packages versus solo mail advertising?
- c. What percentage of your shared mail packages qualified for the letter rate?
- d. What was the average weight of your shared mail packages?
- e. What percentage of your shared mail packages were dropshipped to:
  - i. the destination BMC,
  - ii. the destination SCF, and
  - iii. the destination delivery unit.
- f. What percentage of your shared mail packages were entered at the saturation rate?
- g. What percentage of your shared mail packages were entered at the high density rate?
- h. What percentage of your total mailings were entered at the pound rate?
- i. What percentage of your total mailings, if any, qualified for Standard A Non-Profit rates?
- j. What percentage of your total mailings were entered as Standard A Regular (non-ECR) mail?

NAA/AISOP-T1-2. Please list Money Mailers' principal competitors in its shared mail coupon business. Please indicate which of these competitors rely on the Postal Service to deliver their product.

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NAA/AISOP-T1-3. Please list Money Mailers' principal competitors in its solo mail advertising services. Please indicate which of these competitors rely on the Postal Service to deliver their advertising product.

NAA/AISOP-T1-4. Please list Money Mailers' principal competitors in its program targeted to new movers. Please indicate which of these competitors rely on the Postal Service to delivery their product.

NAA/AISOP-T1-5. Please refer to your testimony at page 8-9. Did factors other than postal rates, such as increases in the prices of paper, contribute to the "big step backward for [your] company" in number of franchisees and mail volumes in 1995 and 1996? Please discuss.

NAA/AISOP-T1-6. Is it in your interest to maintain a viable alternative delivery option even if you do not choose to use it?

NAA/AISOP-T1-7. Do you believe that your customers get a better response rate when their advertisements are mailed than when they are delivered with a newspaper?

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NAA/AISOP-T1-8. Are the prices that you charge customers usually more or less than the prices charged to them by newspapers?